

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:24-CV-23180-BECERRA/TORRES

HERNANDO QUINTERO,  
ALEJANDRA GABRIELA PARRA,  
ALENA OLAZABAL, BETANIA VARGAS,  
ELIS MORENO, KELVID VILLEGAS,  
and MARIA HIDALGO,

Plaintiffs,

vs.

CANTINA CATRINA LLC d/b/a  
CANTINA CATRINA and  
JUAN CARLOS CACHOUA,

Defendants.

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**PLAINTIFFS' AGREED MOTION FOR EXTENSION OF TIME  
TO FILE PLAINTIFFS' COUNSEL'S TIME RECORDS**

Plaintiffs, Hernando Quintero, Alejandra Gabriela Parra, Alena Olazabal, Betania Vargas, Elis Moreno, Kelvid Villegas, and Maria Hidalgo, through their undersigned counsel and pursuant to Fed. R. Civ. P. 12, Local Rule 7.1, and other applicable Rules and laws, request the Court to grant an extension of time for his counsel to file their time records based upon the agreement of the parties and the following good cause:

1. The only remaining issue is for the Court to determine Plaintiffs' reasonable attorney's fees.
2. On April 11, 2025, the Court entered a Paperless Order requiring the undersigned to file their time records by April 18, 2025. [ECF No. 28.]

3. The undersigned sent a draft of the proposed settlement agreement to defense counsel on April 14, 2025, for review and commentary based on the agreement reached at the settlement conference held on April 8, 2025. [ECF No. 27, 28.]

4. Defense counsel provided their proposed changes to the settlement agreement on April 17, 2025, and the parties are in the process of finalizing their proposed revisions to the written settlement agreement.

5. To avoid the undersigned having to submit supplemental time records for the Court's consideration of the additional time after April 18, 2025, to identify the time expended through full execution of the settlement agreement, the Plaintiff requests a brief extension of time to file her counsel's time records.

6. Plaintiff requests the Court grant her an extension of time, requiring her counsel to file their time records within two business days after receiving the fully executed settlement agreement.

7. The parties anticipate finalizing the settlement agreement next week and do not expect to take much longer to sign the final version of the settlement agreement.

WHEREFORE Plaintiffs, Hernando Quintero, Alejandra Gabriela Parra, Alena Olazabal, Betania Vargas, Elis Moreno, Kelvid Villegas, and Maria Hidalgo, respectfully request the Court to extend the deadline to file their counsel's time records based on the agreement of the parties and for good cause shown above.

**LOCAL RULE 7.1 CERTIFICATION**

Counsel for the movant conferred with all parties or non-parties who may be affected by the relief sought in the motion in a good faith effort to resolve the issues raised in the motion and represents that defense counsel agreed to the relief requested above.

Respectfully submitted this 18th day of April 2025,

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